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Attorneys for Defendant
PAYARC, LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION

RICHARD CAMILLERI,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.; EQUIFAX INFORMATION
SERVICES, LLC; CTL MANAGEMENT,
INC.; PAYARC LLC

Defendants.

Case No. 2:25-cv-01013-DJC-CSK

STIPULATION AND ORDER FOR RELIEF
FROM DEFAULT

Plaintiff RICHARD CAMILLERI (“Plaintiff”) and Defendant PAYARC, LLC
 (“Defendant”), through their respective counsel of record, do hereby agree and stipulate as
 follows:

1. Plaintiff filed the Complaint in this manner on April 4, 2025, and served the
 Complaint upon Defendant on April 7, 2025 [ECF Nos. 1 and 5].

2. Through inadvertence and mistake, Defendant did not file a response to the
 Complaint in a timely manner.

3. On July 31, 2025, Plaintiff filed an application for entry of default against
 Defendant [ECF No. 34] and sent the application to Defendant via U.S. Mail. On August 1, 2025,
 before Defendant received Plaintiff’s application, the Court’s Clerk entered default against
 Defendant [ECF No. 35].

1 4. On August 7, 2025, Defendant received Plaintiff's application and promptly
2 contacted Plaintiff's counsel on that date.

3 5. Plaintiff and Defendant hereby agree that: (1) the Court should vacate the default
4 entered against Defendant; (b) Defendant shall file an Answer to the Complaint on or before
5 August 21, 2025; and (c) Defendant shall pay costs to Plaintiff in the amount of \$763.69 on or
6 before August 21, 2025.

7 IT IS SO STIPULATED.

8 Dated: August 11, 2025

RIMON, P.C.

9
10 By: /s/ Brian T. Hafter

11 Brian T. Hafter
12 Attorneys for Defendant
13 PAYARC, LLC

14 Dated: August 11, 2025

GALE, ANGELO & JOHNSON, P.C.

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16 By: /s/ Joseph Angelo

17 Joseph Angelo
18 Attorneys for Plaintiff
19 RICHARD CAMILLERI
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ORDER

Pursuant to the foregoing Stipulation, and on the Court's own motion, the Clerk of Court shall vacate the default judgment entered against Defendant PayArc, LLC on August 1, 2025. [ECF No. 35]. Further, Defendant PayArc, LLC shall pay costs to Plaintiff in the amount of \$763.69 on or before August 29, 2025. Finally, the parties shall file a joint status report pursuant to this Court's Initial Case Management Order [ECF No. 3] within fourteen (14) days after service of this Order.

IT IS SO ORDERED.

Dated: August 22, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE